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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ADAM P. THOMPSON

Plaintiff,

v.

FRANK BISIGNANO,
Commissioner of Social Security,

Defendant.

Case No.: 2:25-cv-000508-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Frank Bisignano, Commissioner of Social Security (Defendant), respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 9, filed on June 18, 2025), currently due on July 18, 2025, by 35 days, through and including August 22, 2025. Defendant further requests that the deadline for Plaintiff's optional reply brief be extended to September 5, 2025.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Defendant's counsel must take several days of medical leave, which prevents Defendant's counsel from being able to work on this response. Counsel is also responsible for writing

1 briefs defending the Commissioner in multiple other district court cases with concurrent due dates. In
2 addition, counsel is responsible for other substantive non-litigation matters in the Office of General
3 Counsel.

4 Additional time is required to review the record, to evaluate the issue raised in Plaintiff's brief,
5 to determine whether options exist for settlement, and if not, to prepare Defendant's response to
6 Plaintiff's brief. Defendant's counsel will endeavor to complete these tasks as soon as possible. This
7 request is made in good faith and with no intention to unduly delay the proceedings, and counsel
8 apologizes for any inconvenience.

9 Counsel for Defendant advised counsel for Plaintiff of the need for this extension on July 16,
10 2025. Counsel for Plaintiff confirmed that Plaintiff does not object to this request.

11 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
12 Brief, through and including August 22, 2025.

13
14 Dated: July 16, 2025

Respectfully submitted,

15 SIGAL CHATTAH
16 United States Attorney

17 /s/ David Priddy
18 DAVID PRIDDY
19 Special Assistant United States Attorney

20
21 IT IS SO ORDERED:

22 
23 _____
24 DANIEL J. ALBREGTS
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: July 17, 2025

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorneys for Plaintiff

Dated: July 16, 2025

/s/ David Priddy
DAVID PRIDDY
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